

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JOHN KARARO, et al., individually and	)	
on behalf of all similarly situated	)	Case No. 23-cv-02187
current and former employees,	)	
	)	
Plaintiffs,	)	The Honorable Jorge L. Alonso
v.	)	
	)	Magistrate Judge Heather K.
OLD DOMINION FREIGHT LINE INC.,	)	McShain
	)	
Defendant.	)	

**PLAINTIFFS' SUPPLEMENTAL PLEADING REFLECTING THAT PLAINTIFF JOHN  
KARARO'S EMPLOYMENT WAS TERMINATED ON JANUARY 24, 2024**

NOW COME the Plaintiffs John Kararo, Sean Walker, Melvyn L. Caison Jr, Ian Travis, Diego Delgado, Gabriel Castellano and Juan Carlos Garcia ("Plaintiffs") by and through their counsel, and submit this Supplemental Pleading to reflect that Plaintiff John Kararo's employment was terminated on January 24, 2024:

1. Plaintiffs hereby supplement Count IV of their Fourth Amended Complaint (Dkt. 77) to reflect that Plaintiff John Kararo was terminated by Defendant on January 24, 2024. See *Kararo v. Old Dominion Freight Line, Inc.*, case no. 24-cv-4299 (N.D. Ill.). "Plaintiff suffered retaliation and was ultimately terminated by ODFL and Defendant Dee Dee Cox because he filed a class action lawsuit against ODFL for violations of the Illinois Biometric Information Privacy Act ("BIPA")[.]". Dkt. 1 in case no. 24-cv-4299, Complaint at ¶7.

2. Further, Plaintiffs supplement Count IV of their Fourth Amended Complaint to reflect that Defendant has refused to provide any proof that it has complied with its policies governing its retention and destruction of biometric data with regard to former employees like Mr. Kararo, in addition to the other named

Plaintiffs who are former employees of Defendant – Plaintiffs Sean Walker, Melvyn L. Caison Jr, Diego Delgado, Gabriel Castellano and Juan Carlos Garcia.

3. Plaintiffs John Kararo, Sean Walker, Melvyn L. Caison Jr, Diego Delgado, Gabriel Castellano and Juan Carlos Garcia and the putative class members are entitled to liquidated damages resulting from Defendant’s violation of Section 15(a) of BIPA.

WHEREFORE, for the above reasons, in relation to Count IV of the Plaintiffs’ Fourth Amended Complaint (Dkt. 77), Plaintiffs John Kararo, Sean Walker, Melvyn L. Caison Jr, Diego Delgado, Gabriel Castellano, Juan Carlos Garcia and the putative class members assert that Defendant retained their biometric data in violation of Section 15(a) of BIPA and as a result of Defendant’s violation of Section 15(a) of BIPA they seek declaratory relief, injunctive relief (in the form of the destruction of their biometric data), liquidated damages, reasonable attorneys and costs.

Respectfully submitted,

/s/ James C. Vlahakis  
Vlahakis Law Group LLC  
20 N. Clark Street, Suite 3300  
Chicago IL 60602  
[jamesv@vlahakislaw.com](mailto:jamesv@vlahakislaw.com)  
312-648-6127

**CERTIFICATE OF SERVICE**

I certify that on August 2, 2024, a copy of the above **SUPPLEMENTAL PLEADING** was served via email on counsel for Defendant:

Jody Kahn Mason  
Jason A. Selvey  
Hannah G. Garlough  
Jackson Lewis P.C.  
150 N. Michigan Ave. Suite 2500  
Chicago, IL 60601  
[Jody.Mason@jacksonlewis.com](mailto:Jody.Mason@jacksonlewis.com)  
[Jason.Selvey@jacksonlewis.com](mailto:Jason.Selvey@jacksonlewis.com)  
[Hannah.Garlough@jacksonlewis.com](mailto:Hannah.Garlough@jacksonlewis.com)

By: /s/ James C. Vlahakis  
James C. Vlahakis  
**VLAHAKIS LAW GROUP LLC**  
20 N. Clark Street, Suite 3300  
Chicago, Illinois 60602  
[jamesv@vlahakislaw.com](mailto:jamesv@vlahakislaw.com)  
312-648-6127